

Robert W. Freeman, Jr., Esq.
 Nevada Bar No. 003062
 LEWIS BRISBOIS BISGAARD & SMITH LLP
 6385 S. Rainbow Blvd., Suite 600
 Las Vegas, Nevada 89118
 702-893-3383
 Attorneys for Defendant
 Clark County

UNITED STATES DISTRICT COURT

CLARK COUNTY, NEVADA

* * * * *

TRINA BRITAIN, KARL BEAVERS,)	CASE NO: 2:12-cv-01240-JAD-NJK
RONALD BROOKS, BRET CEGAVSKE,)	
BILLY CRANK, DENNIS CURRAN, KEVIN)	STIPULATION AND ORDER TO
ECKHART, KENNETH HAWKES, RANDY)	EXTEND THE TIME FOR FILING
HAWKES, IAN MASSY, RIC MOON,)	THE JOINT PRE-TRIAL ORDER
GRAJEDA NUBIA, MICHAEL PETTY,)	
KAREN PIXLER, ERIC PRUNTY,)	(First Request)
ANTHONY RUSSO, TOM SERRANO,)	
ANTHONY SMITH, MICHAEL SMITH,)	
ENRIQUE STIEGELMEYER, ANTHONY)	
VOGEL, and LAMONS WALKER,)	
)	
Plaintiff,)	
)	
vs.)	
)	
CLARK COUNTY, NEVADA,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED between the parties, by and through their respective counsel, that the parties shall have an additional ninety (90) days in which to file their Joint Pre-Trial Order. The Joint Pre-Trial Order is currently due on April 30, 2015.

The extension is requested and based on the following:

Robert W. Freeman, counsel for defendants has been involved in multi day out of state

1 depositions during the month of April 2015 in *Hackler v. State Farm*, 3:14-cv-0531-MMD-VPC.
2 Further depositions in this matter are expected to continue through late May and early June. In
3 addition counsel for defendants is involved in preparing a motions for summary judgment in
4 *Graham v. City of North Las Vegas*, 2:13-cv-1818-KJD-VCF and *Plank v. Mayoral*, 2:12-cv-2205-
5 *JCM-PAL*. In addition counsel is preparing an opening brief in *Koiro v. Catanese*, 14-17514.
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7 Finally, counsel for defendants in preparing for trial in *Schwartz v. GEICO*, A594541, set
8 to begin June 22, 2015.

9 Counsel for plaintiffs counsel just finished a three (3) day hearing before the Employee
10 Management Relations Board ("EMRB") in *O'Leary v Las Vegas Metropolitan Police*
11 *Department*, EMRB Case No. A1-046116 and is currently preparing for back to back cases before
12 the EMRB in *NCLEA v Nye County*, EMRB Case No. A1-046123 and *ESEA/POA of CCSD v*
13 *Clark County School District*, EMRB Case No. A1-046113 which are scheduled to begin on June
14 9, 2015.
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16 In addition, counsel for plaintiff's wife was hospitalized on February 17, 2015 with a life
17 threatening cardiac condition which has limited his availability.
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19 The additional time will allow the parties the necessary time to prepare the Joint Pre-Trial
20 Memo.
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22 Based on the foregoing, the parties request that this Court order the time for to file the Joint
23 Pre-Trial order be extend ninety (90) days up to and including July 29, 2015.

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3 The parties acknowledge that this stipulation is made in good faith and not for purposes of
4 delay.

5 DATED this 22nd day of April, 2015.

DATED this 22nd day of April, 2015.

6 LEWIS BRISBOIS BISGAARD & SMITH

LAW OFFICE OF DANIEL MARKS

7
8 /s/ Robert W. Freeman

Robert W. Freeman, Esq.

9 Nevada Bar No. 3062

10 6385 S. Rainbow Blvd., Suite 600

Las Vegas, Nevada 89118

11 Attorneys for Defendant

Clark County

/s/ Adam Levine

Adam Levine, Esq.

Nevada Bar No. 4673

610 S. Ninth Street

Las Vegas, Nevada 89101

Attorneys for Plaintiffs

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13
14 **ORDER**

15 IT IS SO ORDERED.

16 Dated: April 23, 2015.

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19 
20 U.S. DISTRICT COURT JUDGE
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